

REMARKS

This paper is submitted in response to the Office Action dated June 14, 2006. In addition, Applicant respectfully requests that a three-month extension of time be granted to respond to the Office Action mailed June 14, 2006, and that the Examiner consider this a petition therefor. The period of response therefore extends up to and includes December 14, 2006, and this paper is timely filed. Authorization for a Credit Card charge of \$510.00 for the three-month extension fee is hereby included in the Electronic Fee Sheet attached. Reconsideration and allowance of all pending claims by the Examiner are therefore respectfully requested.

In the subject Office Action, claims 26-28, 30-31, 48-49, 61, 68-70 and 75-76 were rejected under 35 U.S.C. § 101. Furthermore, claims 14-26, 39-41, 44, 55-59, 67-70 were rejected under 35 U.S.C. § 112, first paragraph; and claims 8-13 and 43 were rejected under 35 U.S.C. § 112, second paragraph. Moreover, claims 1, 27-28 and 65 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,748,330 to Wang (Wang). In addition, claims 2, 5, 8-9, 12, 42-43, 46-47, 60, 62, 64, 68-69 and 75-76 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang in view of U.S. Patent No. 5,729,632 to Tai (Tai); claims 3 and 30-31 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang in view of U.S. Patent No. 5,696,604 to Curry (Curry); claim 4 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang in view of Curry and U.S. Patent No. 5,982,989 to Broddin (Broddin); claims 7, 14, 19 and 73 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang in view of U.S. Patent No. 5,828,463 to Delabastita (Delabastita); claims 10, 63 and 70 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang in view of Tai and Curry; claim 13 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang in view of Tai and Delabastita; claims 45, 48-49, 61 and 71 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,631,748 to Harrington (Harrington) in view of Tai; claim 11 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang in view of Tai, Curry, Broddin and U.S. Patent No. 5,627,919 to Kemmochi (Kemmochi); claims 15, 20, 22, 25 and 74 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang in view of Delabastita and Curry; claim 16 was rejected under 35 U.S.C. § 103(a) as being

unpatentable over Wang in view of Delabastita, Curry, Broddin and Kemmochi; claims 17-18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang in view of Delabastita and Tai; claims 21 and 24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang in view of Delabastita, Curry and Tai; claim 23 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang in view of Delabastita, Curry and Broddin; claim 26 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Harrington in view of U.S. Patent No. 4,196,451 to Pellar (Pellar); claims 33-37, 39-41, 44, 50-52, 54-58 and 67 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Harrington in view of Delabastita and Tai; claims 53 and 59 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Harrington in view of Delabastita, Tai and Kemmochi; claim 66 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang in view of Kemmochi; and claim 72 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Harrington in view of Tai and Delabastita.

Applicant respectfully traverses the Examiner's rejections to the extent that they are maintained. Applicant has amended claims 1, 8, 14, 20, 26, 27, 30, 33, 45-48, 60, 62, 63, 67, 68 and 75, in deference to the Examiner's suggestions. Applicants have additionally cancelled claims 28, 31, 49 and 76. Applicant respectfully submits that no new matter is being added by the above amendments, as the amendments are fully supported in the specification, drawings and claims as originally filed.

As an initial matter, Applicant wishes to thank the Examiner for the courtesy extended in the telephonic interview between the Examiner and Applicant's representative on December 11, 2006. In the interview, proposed amendments to the claims to address the art-based rejections were discussed, mainly as they concerned primary reference, Wang. Proposed amendments were discussed, and the Examiner agreed to consider the amendments in due course.

Applicant has amended the claims rejected on §101 and §112 grounds. Applicant believes the claims now meet all statutory requirements. Withdrawal of the §101 and §112 rejections are therefore respectfully requested.

Next turning to the art-based rejections, all of the independent claims have been amended. In an effort to focus the discussion and advance prosecution, Applicant now addresses these independent claims, rather than their respective dependent claims.

However, Applicant notes that these dependent claims also include features that further distinguish from the cited prior art.

Turning more particularly to claim 1, this claim has been amended to include that the overlap between halftone dots is determined, or deliberate. This contrasts the methods disclosed in Wang, which seeks to correct for unintentional overlaps between spots (making up halftone dots). Of note, the claimed overlap occurs between halftone dots within the same cell of the same halftone screen.

Claims 14, 27 and 46 generally include these same features, and are consequently patentable over the cited art for similar reasons. Reconsideration and allowance of claims 1, 14, 27 and 46, as well as of their respective dependent claims, are therefore respectfully requested.

Independent claim 8 has been amended to include that the first and second dots are at the same threshold value. Those halftone dots within Tai having dissimilar characteristics are generated at different threshold values. Moreover, Tai combines different screens to create frequency affects (col. 8, lines 18-20 col. 10, lines 7-10 and col. 5, lines 45-48) included within the same halftone screen. These features are not disclosed or suggested in the prior art. Furthermore, these features are similarly recited in independent claims 20, 30 and 47. Reconsideration and allowance of claims 8, 20, 30 and 47, as well as those that depend therefrom, are therefore respectfully requested.

Independent claims 33, 45, 48 and 67 generally include halftone dots having different line frequencies at a common threshold value, generated on a common halftone screen. Both Tai and Harrington use multiple halftone screens, and neither, as with Delabastita, suggests or motivates different line frequencies at the same threshold value. Reconsideration and allowance of claims 33, 45, 48 and 67, as well as of those that depend therefrom, are therefore respectfully requested.

Claims 60, 68 and 75 generally include a threshold array having a transition period that comprises multiple halftone dots (generated a common threshold value) having different line frequencies. As discussed herein, none of the cited art suggests such features. Reconsideration and allowance of claims 60, 68 and 75, as well as of those that depend therefrom, are therefore respectfully requested.

Claim 26 recites a fold function that enables many of the claimed features. Applicant respectfully traverses any assertion that the function is obvious, merely because it represents one of many combinations. The prior art does not suggest or motivate the subtle, but important distinctions recited in the claimed fold function.

In summary, Applicant respectfully submits that all pending claims are novel and non-obvious over the prior art of record. Reconsideration and allowance of all pending claims are therefore respectfully requested. If the Examiner has any questions regarding the foregoing, or which might otherwise further this case onto allowance, the Examiner may contact the undersigned at (513) 241-2324. Moreover, if any other charges or credits are necessary to complete this communication, please apply them to Deposit Account 23-3000.

Respectfully submitted,

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Date

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